

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

The Estate of RANDI SHAVONNE  
KIRKLAND, by and through Special  
Administrator, VIRGINIA KIRKLAND,

Plaintiff,

v.

Case No. CIV 19-411-RAW

HT GLOBAL IT SOLUTIONS HOLDINGS  
LIMITED, et al.,

Defendants.

**MOTION TO DISMISS SPECIFIED DEFENDANTS WITHOUT PREJUDICE**

Plaintiff, the Estate of Randi Shavonne Kirkland, by and through Special Administrator, Virginia Kirkland, by and through her counsel, hereby moves this Court to dismiss the following Defendants **without prejudice** to the refiling thereof. Plaintiff wishes to dismiss the following Defendants:

1. Hexaware Technologies;
2. Hexaware Technologies LTD;
3. Hexaware Technologies GMBH;
4. Focus Frame, Inc.;
5. Hexaware Technologies Asia-Pacific PTE, LTD;
6. Hexaware Technologies Canada Limited;
7. Hexaware Technologies UK LTD.;
8. Specsoft Consulting, Inc.;
9. Risk Technology International LTD.;
10. Hexaware Technology & Business Solutions, Inc.;

11. EAN Holdings, LLC, D/B/A Enterprise Rent-A-Car;

12. National Car Rental; and


13. Vanguard Car Rental USA, LLC.

Plaintiff's counsel has conferred with counsel for EAN Holdings, LLC, D/B/A Enterprise Rent-A-Car and Vanguard Car Rental USA, LLC, and that counsel has no objection to the dismissal without prejudice of National Car Rental and Vanguard Car Rental USA, LLC. That counsel had no authority from his clients whether to consent to dismiss without prejudice any of the other listed Defendants stated above.

Plaintiff's counsel attempted to confer with counsel for Hexaware Technologies, Inc., Hexaware Technologies Canada Limited, Gaurav Shukla, and Ujjwal Narayan about her motion for dismissal without prejudice of the Defendants stated above, but could not reach opposing counsel.

As such, Plaintiff respectfully requests this Court enter an order dismissing without prejudice only the Defendants stated above pursuant to Rule 41(a)(2).

Respectfully submitted,



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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of January 2020, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants.

Sterling E. Pratt  
Robert D. James

**BRANUM LAW FIRM, PLLC**

A handwritten signature in black ink, appearing to read "John Branum", is written over a horizontal line.

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